



2. This removal is timely under 28 U.S.C. § 1446(b). Defendant first received a copy of Plaintiff's Complaint by certified mail on August 3, 2018.

3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all process, pleadings and orders received by Defendant in the state court action.

4. The United States District Court for the Middle District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against Defendant alleging violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* and the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, Defendant has provided notice of this removal to all parties and to the Court of Common Pleas of Lackawanna County, Pennsylvania.

WHEREFORE, Defendant removes this case to the United States District Court for the Middle District of Pennsylvania.

Respectfully submitted,

**MESSER STRICKLER, LTD.**

By: /s/ Lauren M. Burnette  
LAUREN M. BURNETTE, ESQUIRE  
PA I.D. No. 92412  
450-106 State Road 13 N.  
Suite 326  
St. Johns, FL 32259  
(904) 201-9120  
[lburnette@messerstrickler.com](mailto:lburnette@messerstrickler.com)  
Counsel for Defendant

Dated: August 27, 2018

**CERTIFICATE OF SERVICE**

I certify that on August 27, 2018, a true copy of the foregoing document was served as follows:

By Electronic Filing and  
By Email to  
[joesucec@comcast.net](mailto:joesucec@comcast.net)  
Joseph T. Sucec, Esquire  
Po Box 317  
Grantham, PA 17027

By Electronic Filing  
Court of Common Pleas  
Lackawanna County  
Brooks Building  
436 Spruce St.  
Scranton, PA 18503

**MESSER STRICKLER, LTD.**

By: /s/ Lauren M. Burnette  
LAUREN M. BURNETTE, ESQUIRE  
PA I.D. No. 92412  
450-106 State Road 13 N., Suite 326  
St. Johns, FL 32259  
(904) 201-9120  
[lburnette@messerstrickler.com](mailto:lburnette@messerstrickler.com)  
Counsel for Defendant

Date: August 27, 2018